



October 2, 2006

Kevin Martin, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: FCC Docket #97-80

Dear Chairman Martin:

On behalf of the League of Rural Voters, I write to ask the Federal Communications Commission to grant a temporary waiver of the pending cable set-top box integration ban, which would adversely impact consumers, particularly rural America, by placing an effective monthly "tax" on their set-top boxes.

Founded in 1985, the League of Rural Voters is a non-profit, national membership organization dedicated to increasing the representation of rural people in the policy making process. Rural America covers 80 percent of U.S. lands and is home to an increasingly diverse population of 55 million people. With abundant natural resources and strong core values of hard work, community, family and faith, rural America has provided the nation with much of its wealth and many of its greatest leaders.

The FCC's set-top box integration-ban represents an unnecessary government mandate. The ban would prevent cable companies from leasing set-top boxes with integrated security – the function that allows customers to receive the programming for which they have paid. Instead, cable companies would be compelled to lease only those boxes with removable security capabilities using CableCARD technology.



The newly engineered boxes could cost consumers an estimated \$600 million in added costs in return for no additional benefits. Every consumer leasing a new box would likely have to pay an additional \$2 to \$3 per month per box. Rural Americans, already facing burdensome fuel prices and prohibitively costly health care premiums, should be spared of this unnecessary charge.

Furthermore, increasing the cost of digital set-top boxes would make America's digital transition goals even more challenging to achieve. It would dampen the incentive for rural Americans to switch from analog to digital services that offer premium content and help keep rural areas connected. By reducing the ability of rural Americans to afford digital cable boxes, the FCC will also reduce the incentive for network operators to spread their digital networks far and wide throughout rural America.

While we might understand the FCC's stated intent to spur greater competition in the market for "plug and play" devices using CableCARDS, now is not the time to impose an unnecessary government burden that will tax millions of cable customers. We should instead promote policies that will speed the digital transition and reduce prices for advanced technologies.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Niel Ritchie", with a large, stylized loop at the end.

Niel Ritchie, Executive Director
League of Rural Voters

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